

The Commonwealth of Massachusetts  
Executive Office of Health and Human Services  
Department of Public Health  
**William A. Hinton State Laboratory Institute**  
305 South Street, Jamaica Plain, MA 02130

DEVAL L. PATRICK  
GOVERNOR

TIMOTHY P. MURRAY  
LIEUTENANT GOVERNOR

JUDYANN BIGBY, MD  
SECRETARY

JOHN AUERBACH  
COMMISSIONER

Joseph Roseme, ADA

Suffolk County District Attorney's Office

By e-mail

February 16, 2012

Re: Comm. v. [REDACTED]

ADA Roseme,

Please find below the discovery package for the case noted above. The material is collated in the following manner:

- 1) the c.v.'s of the chemists
- 2) the Evidence Office receipt to the Boston Police
- 3) the inventory control card
- 4) the pharmaceutical analysis Sheet
- 5) the pharmacopeia reference, *Micromedex*
- 6) the gas chromatography/mass spectrometry (gc/ms) data

I was the custodial chemist responsible for the chain of custody, weights and the preliminary analysis of the exhibit. Kate Corbett operated the gc/ms for the confirmatory analysis.

If you need further clarification of this material, call me directly at (617) 983-6627.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lawler".  
Michael Lawler  
Senior Chemist

Cc: Kate Corbett

## Curriculum Vitae

### **Michael Lawler**

#### **Education:**

University of Virginia, Charlottesville, Va. Bachelor of Arts in English, 1975

Harvard University, Cambridge, Ma. Master of Arts in biology, 1995

#### **Experience:**

**1990-present** currently Chemist III, Mass. Dept. of Public Health, Drug Lab analyst determining the identity of unknown substances and providing expert testimony in the Courts. Conduct special testing for poisons within drug exhibits (e.g. strychnine in MDMA)

**2005-2008** lecturer in chemistry, Curry College, Milton, Ma.

**1988-1990** New England Newborn Screening (NENS) Biochemist conducting pilot studies and validation trials of new newborn screening tests. Investigator and co-author of papers noted below. Introduced screening test for Biotinidase Deficiency. Liaison with interstate collaborators in national studies.

**1983-1988** Supervised NENS urine screening lab for metabolic disorders. Conducted research in collaboration with Children's Hospital (Boston) detecting neuroblastoma, a cancer of early childhood. Conducted reference testing for rare metabolic disorders for an international audience.

**1982-1983** NENS hypothyroid assay technologist with Tuft's University

**1979-1981** Mass. Bay Community College, staff technologist preparing materials for the laboratory technician program, which included reagents, apparatus and maintaining stock cultures of human pathogens.

#### **Additional education and special training**

Drug Analysis, completed six week training course by senior staff within the Department of Public Health Drug Analysis Laboratory

National Laboratory Network Training Program course as Expert Witness

Qualified as an expert witness in the Massachusetts Courts and the U.S. District Court Current Drug Trends – Multijurisdictional Drug Task Force Academy August 2009

CDC course in public health response to bioterrorism

U.S. Army course in biologic warfare and terrorism

DEA Special Testing Lab Seminar June 2011

Sigma-Aldrich LC/MS – New Applications Fall 2011

#### **Journal Publications**

*Screening*, 1992, 1:34-37; Lawler,M., Frederick,S., Rodriguez-Anza, S., Wolf,B., Levy,H., *Newborn Screening for Biotinidase Deficiency, Pilot Study and Follow-up of Identified Cases*

*Genetic Screening*, 1990, 11-18, Mitchell,M., Lawler,M., Walraven,C., Hermos,R., *To Screen or Not to Screen for Congenital Hyperplasia: Is that the Question?*

*The Journal of Pediatrics*, 116: 78-83, Secor-McVoy,J., Lawler,M., Schmidt, M., Ebers,D., Hart,P., Pettit,D., Blitzer,M., Wolf,B., *Partial Biotinidase Deficiency: Clinical and Biochemical Features*

#### **Professional Affiliations**

Northeastern Association of Forensic Scientists (NEAFS) since 2005

#### **Awards**

Theobald Smith Education Grant for graduate studies

# Curriculum Vitae

Kate A. Corbett

## Education

Bachelor of Science Degree, CHEMISTRY May 2003

MERRIMACK COLLEGE

Coursework included: Organic Chemistry, Inorganic Chemistry, Quantitative Analysis, Instrumental Analysis, Physical Chemistry, Physics, Calculus

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## Employment

Chemist II State Laboratory Institute (March 2008-Present)

Massachusetts Department of Public Health

Drug Analysis Laboratory

- Responsible for the identification of substance and trafficking substances to determine violation of the Massachusetts drug laws
- Responsible for the identification of pharmaceuticals to determine violation of the Massachusetts drug laws
- Operate analytical instrumentation, microscopes and balances for forensic drug analysis

Chemist I State Laboratory Institute (2005-March 2008)

Massachusetts Department of Public Health

Drug Analysis Laboratory

- Responsible for the identification of substance to determine violation of the Massachusetts drug laws
- Operate analytical instrumentation for the purpose of performing forensic drug analysis
- Successfully completed an eight week training course in the analysis of drugs conducted by senior staff of the Department of Public Health, Drug Analysis Laboratory
- Appointed an assistant analyst for the Department of Public Health, Drug Analysis Laboratory in 2005

Research Associate (September 2003 - August 2005)

SENSOR TECHNOLOGIES, INC - Shrewsbury, MA

- Prepared chemistries used in making sensor beads
- Generated and examined sensors employing fluorescence spectroscopy
- Performed protein, dye and sugar assays using UV/VIS spectrophotometry
- Carried out titrations on ricin using fluorescence correlation spectroscopy
- Statistical analysis of experimental data

Intern (March 2003 - August 2003)

MASSACHUSETTS STATE POLICE CRIME LABORATORY - Sudbury, MA

- Assisted in the gathering of case files to fulfill the National Institute of Justice's No Suspect Backlog Reduction Grant
- Observed in the Evidence, Criminalistics, DNA, Drug, Trace, Toxicology, and Bomb/Arson Units



## **DRUG RECEIPT**

BOOK # 156

PAGE # 181

**DESTRUCTION #**

District/Unit B101D

Name & Rank of Arresting Officer PO Brendan Lyons | Michael Condon ID# 82917 / 93431

**To be completed by ECU personnel only**

**Name and Rank of Submitting Officer**

Received by

Date 11-14-11

ECU Control #

[REDACTED] Date Analyzed: 1/12/12

City: Boston D.C.U. Police Dept.

Officer: P.O. Diana Lopez  
[REDACTED]

Amount: 49.0

Subst: TAB

No. Cont: 1 Cont: pc

Date Rec'd: 11/14/2011

No. Analyzed: 2

Gross Wt.: 22.89 ✓

Net Weight: 8.14g

# Tests:

2 Ing tabs to test

Prelim: Clonazepam

Findings:

Clonazepam

Pharmaceutical Analysis Sheet

(2-7)  
VV

[REDACTED] City Bethesda E.O. weight 22.89g  
Count 49 tablets Description: Rx bottle  
Ballistic I.D. clonazepam 1mg 833 TEVA Net wt 8.1422g  
I.D. Source MicroMedex green  
Final I.D. clonazepam MS chemist KAC completed 1/12/12

# Drug Information

**DRUG NAME:** CLONAZEPAM

**INGREDIENTS:** CLONAZEPAM -- 1 MG

**Color:** Green

**NDC:** 00093-0833-93

00093-0833-10

00093-0833-05

00093-0833-01

**Shape:** Circle

**Imprint:** 833 This tablet is debossed with 833 above the scored line and TEVA on the unscored side , TEVA

**Excipients:** Lactose

(Monohydrate) ; Magnesium

Stearate ; Cellulose,

Microcrystalline ; Povidone ; Water,

Purified ; Starch, Corn ; D&C Yellow No.

10 Aluminum Lake ; FD&C Blue No. 1

Aluminum Lake

**Form:** Oral Tablet

**Regulatory Status:** Schedule IV

**Available-Container-Size:** Bottle of 100 , Bottle of 1000 , Bottle of 500

**Availability:** United States

**AAPCC Code:** 007000 - Benzodiazepines

**Product ID:** 7150694

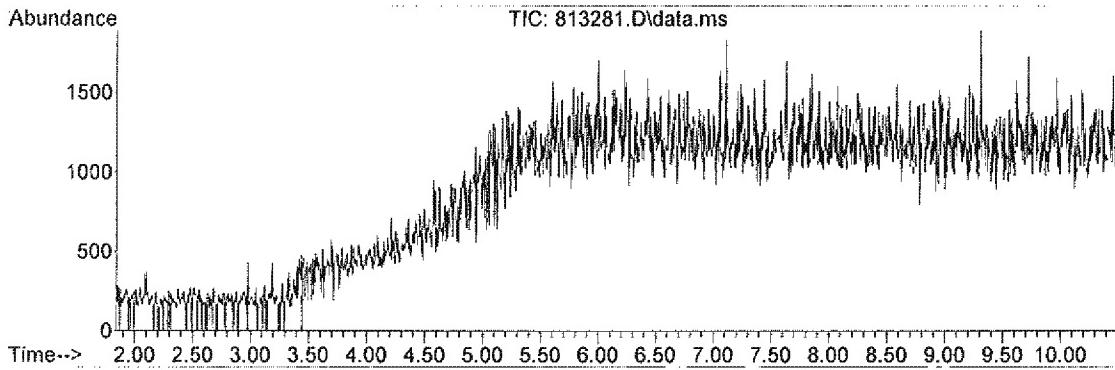
**Contact:** Teva Pharmaceuticals

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✓KAC  
2/15/12

## Information from Data File:

Operator : KAC  
Date Acquired : 12 Jan 2012 6:53  
Sample Name : BLANK  
Submitted by :  
Vial Number : 2  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE

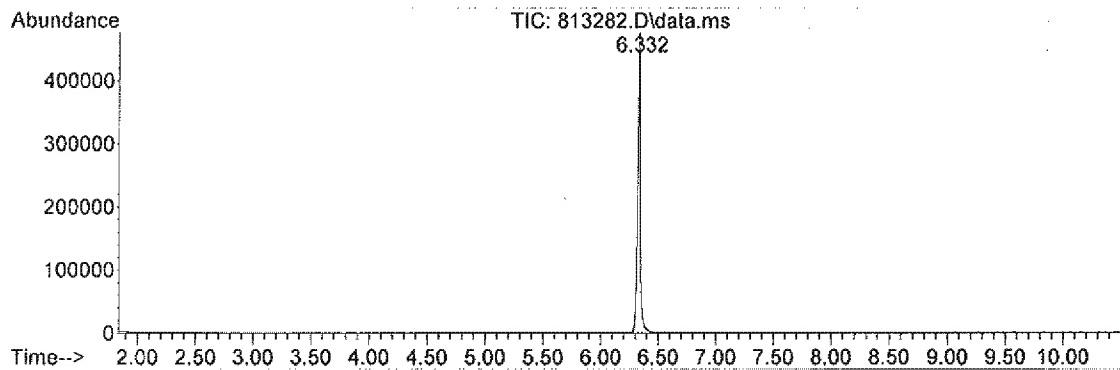


Ret. Time	Area	Area %	Ratio %
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\*\*\*NO INTEGRATED PEAKS\*\*\*

## Information from Data File:

Operator : KAC  
Date Acquired : 12 Jan 2012 7:06  
Sample Name : CLONAZEPAM STD  
Submitted by :  
Vial Number : 82  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE



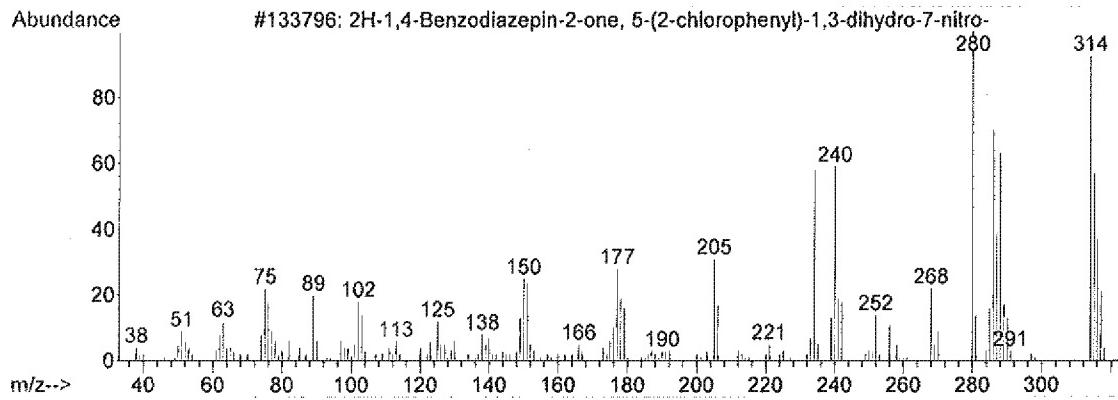
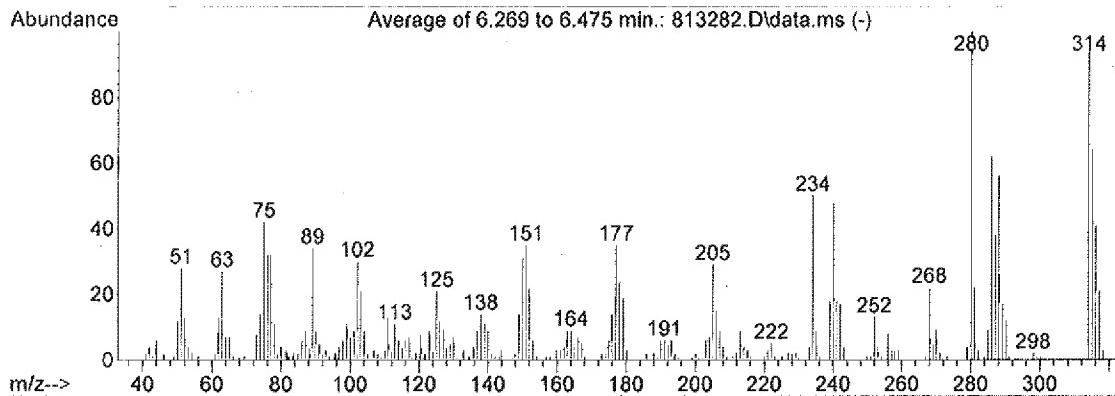
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## Information from Data File:

Operator : KAC  
Date Acquired : 12 Jan 2012 7:06  
Sample Name : CLONAZEPAM STD  
Submitted by :  
Vial Number : 82  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80  
C:\Database\NIST05a.L Minimum Quality: 80  
C:\Database\PMW\_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	6.33	C:\Database\NIST05a.L		
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	92

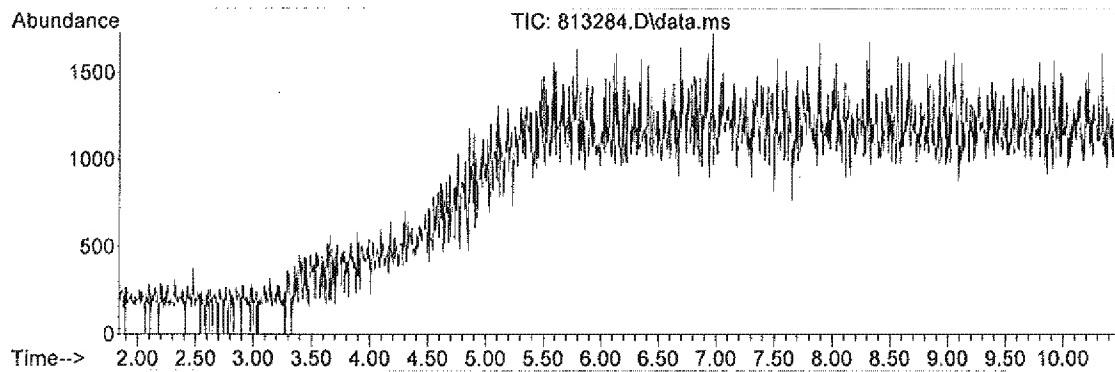


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Operator : KAC  
Date Acquired : 12 Jan 2012 7:32  
Sample Name : BLANK  
Submitted by : MGL  
Vial Number : 2  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE

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Ret. Time	Area	Area %	Ratio %
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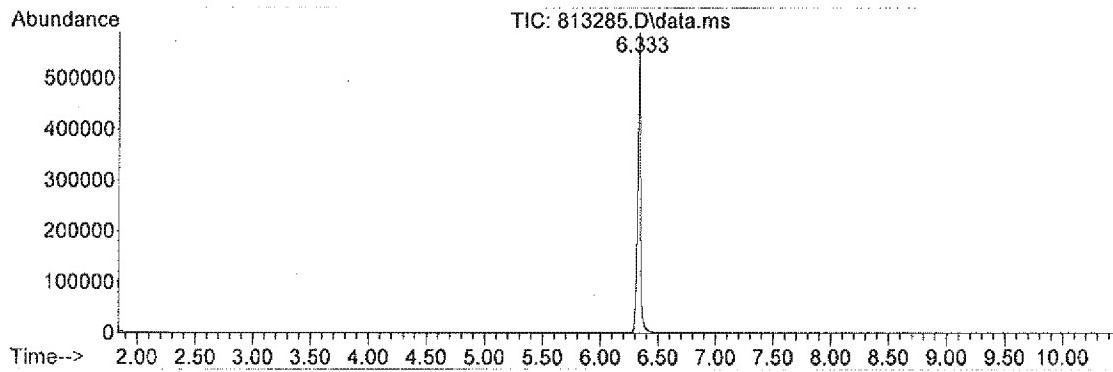
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\*\*\*NO INTEGRATED PEAKS\*\*\*

Information from Data File:

Operator : KAC  
Date Acquired : 12 Jan 2012 7:45

Submitted by : MGL  
Vial Number : 85  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE



Ret. Time	Area	Area %	Ratio %
6.333	1008612	100.00	100.00

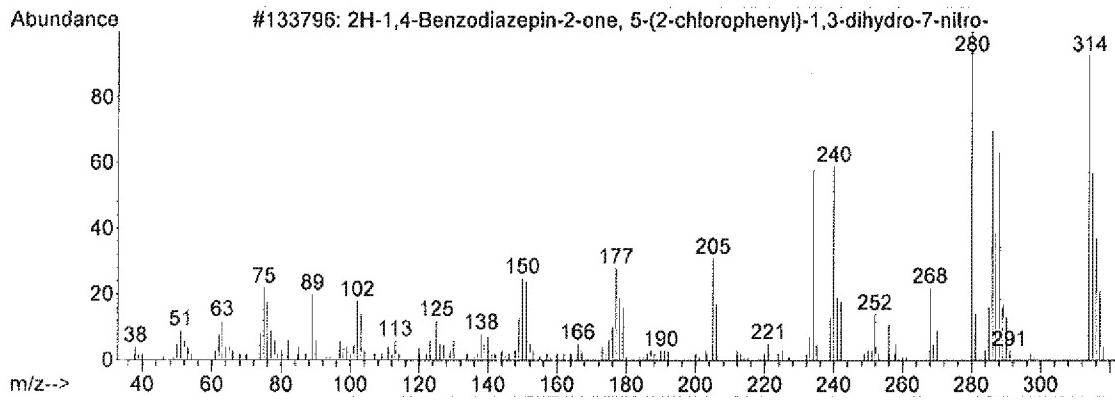
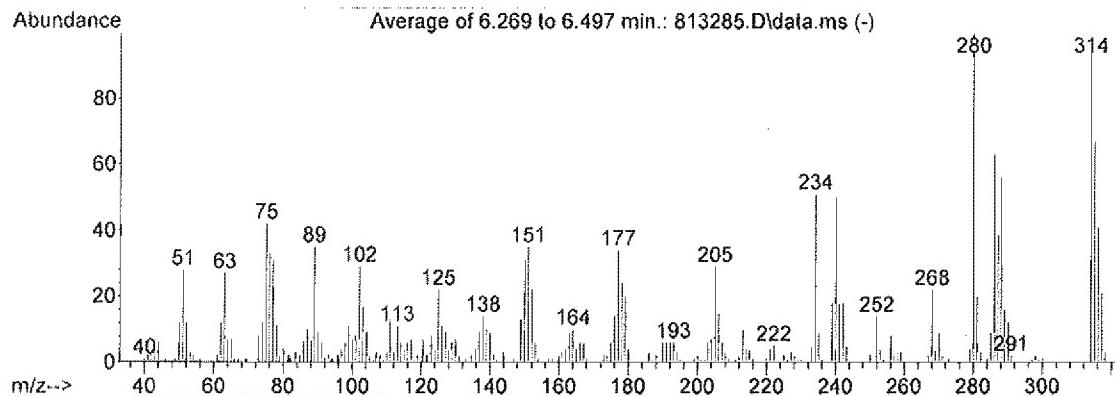
Information from Data File:  
[REDACTED]

Operator : KAC  
Date Acquired : 12 Jan 2012 7:45  
[REDACTED]

Submitted by : MGL  
Vial Number : 85  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80  
C:\Database\NIST05a.L Minimum Quality: 80  
C:\Database\PMW\_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	6.33	C:\Database\NIST05a.L		
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	92

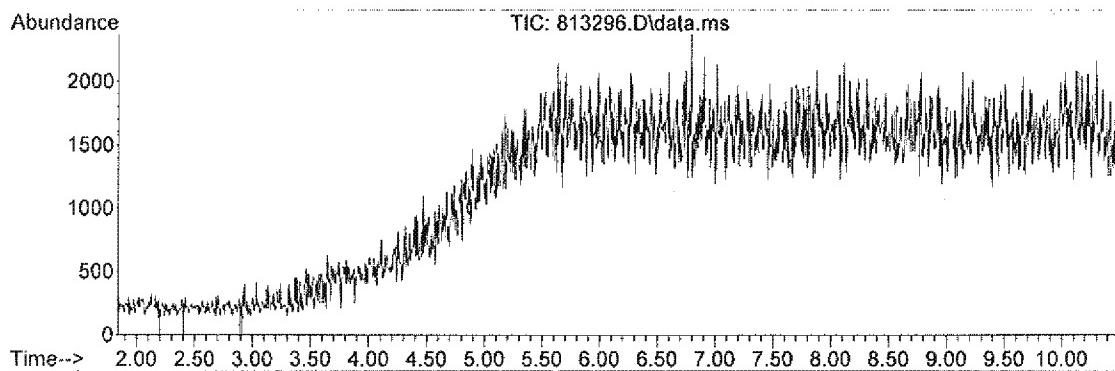


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Information from Data File:

Operator : KAC  
Date Acquired : 12 Jan 2012 10:09  
Sample Name : BLANK  
Submitted by :  
Vial Number : 2  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE

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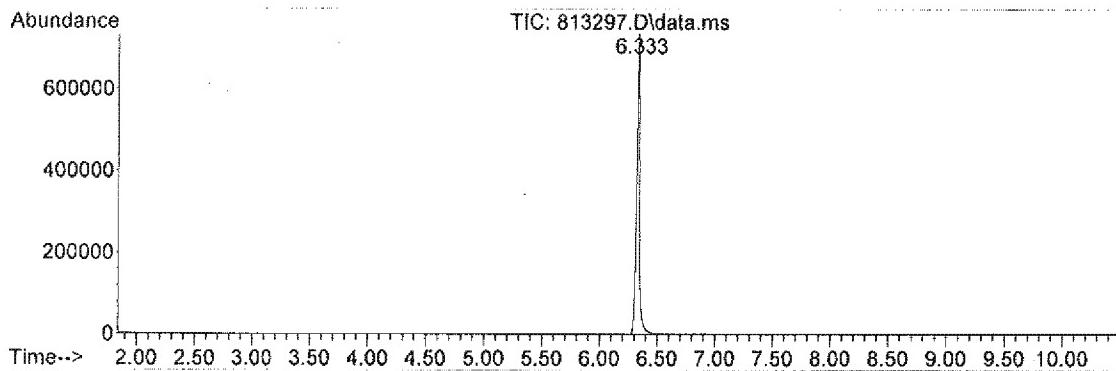
Ret. Time	Area	Area %	Ratio %
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\*\*\*NO INTEGRATED PEAKS\*\*\*

Information from Data File:

Operator : KAC  
Date Acquired : 12 Jan 2012 10:22  
Sample Name : CLONAZEPAM STD  
Submitted by :  
Vial Number : 82  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE



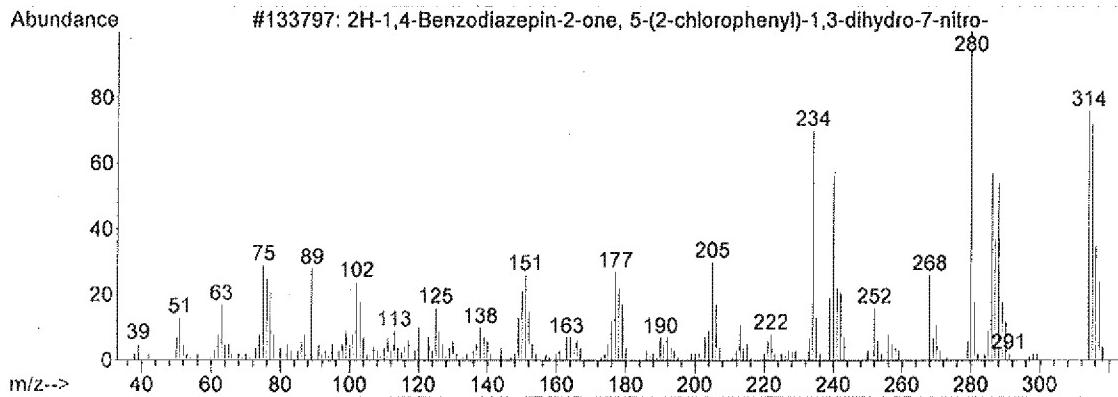
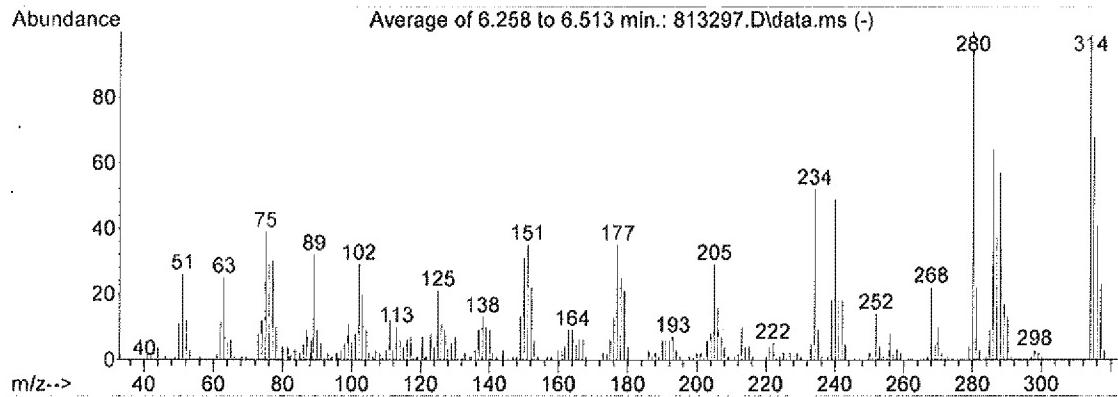
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## Information from Data File:

Operator : KAC  
Date Acquired : 12 Jan 2012 10:22  
Sample Name : CLONAZEPAM STD  
Submitted by :  
Vial Number : 82  
AcquisitionMeth: CLONAZ.M  
Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80  
C:\Database\NIST05a.L Minimum Quality: 80  
C:\Database\PMW\_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	6.33	C:\Database\NIST05a.L		
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99



*Last page..... ...no further data*